

## The Law Office of Joshua Moskovitz P.C.

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## **BY ECF and FAX**

Hon. Alvin K. Hellerstein United States District Judge United States Courthouse 500 Pearl Street New York, New York 10007 Fax: (212) 805-7942 October 30, 2024

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MARKETTONIA

Re: Javier Solis v. City of New York, Case No. 24 Civ. 4239 (AKH)

Your Honor:

I write on behalf of Plaintiff, with consent of counsel for Defendant City of New York, to request an extension of the November 1, 2024 deadline in paragraphs B(2) and (3) of the Court's Civil Case Management Plan (Dkt. 16) for the joinder of additional parties and to file amended pleadings. Plaintiff requests a three-week extension, until November 22, 2024, for these deadlines. The reason for this request is that Plaintiff has not yet received information he needs to identify the John Doe defendants because the parties have not yet reached agreement on a confidentiality stipulation and protective order. The parties have made substantial progress in resolving disagreements about the confidentiality stipulation and we anticipate a proposed order will be filed shortly. If this request is granted, it will not require a modification of any other date in the current scheduling order. A proposed order on this request is enclosed.

Respectfully,

Joshua S. Moskovitz

Enc.

cc: All Counsel of Record